

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

**CHARLES G. COPELAND, an individual; §
AND COFOUR, LLC, a limited liability §
company §**

Plaintiff, §

v. §

**ALAMO BILLING COMPANY AND §
MANAMED, INC., §**

Defendants. §

**§ CIVIL ACTION NO. 4:20-CV-00393-
§ SDJ-CAN**

DECLARATION OF DAVID OVARD

The following declaration is made pursuant to 28 U.S.C. § 1746:

“My name is David Ovard. I am over eighteen (21) years of age and of sound mind. I have not been convicted of a felony or crime involving moral turpitude. I have personal knowledge of the facts set forth herein and know them to be true and correct. I am fully competent to testify to the matters stated herein.

I am a member of the law firm of Clark Hill, PLC. I am the attorney of record for the Plaintiffs in the above cause. I have been a licensed attorney in the state of Texas since 1998. I have practiced throughout the State of Texas and in the Federal District Courts within the Fifth Circuit, including the Eastern District of Texas.

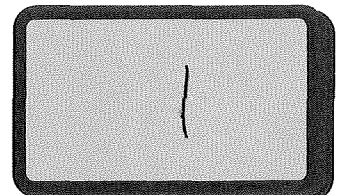
As a member of Clark Hill and lead counsel for this lawsuit, I have access to the firm’s books and records relating to timekeeping, payment of fees, and client invoicing. These books and records are kept by Clark Hill in the regular course of its business, and it was the regular course of business for an employee of Clark Hill with knowledge of the act or event recorded to make the records of the same or to transmit information thereof to be included in such records, and the records were made at or near the time reflected therein.

I researched and reviewed all of the necessary documents in Clark Hill’s possession regarding the subject lawsuit, and the statements in this declaration are based upon my research and review of these documents.

Plaintiffs filed suit against Defendants in this matter on April 28, 2020. Since that time, Clark Hill has worked a total of 68.40 hours on Plaintiffs’ behalf. The total attorney fees incurred to date, including both amounts billed to date and unbilled amounts, includes \$35,566.50 in attorneys’ fees. All hours worked by myself and associate attorneys were worked under my supervision and at my discretion. Plaintiffs also incurred a total of \$1,901.07 in fees and costs of suit.

DECLARATION OF DAVID OVARD

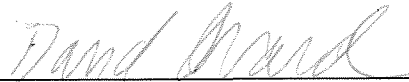
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All attorneys' fees incurred in this matter have been necessary and reasonable, and those customarily charged for similar services in similar litigation in the Eastern District of Texas. All work done on this matter was performed by me or at my discretion. I have handled multiple cases previously in the Texas federal district courts including similar subject-matter as this lawsuit. Based on my experience as an attorney and partner of a Texas law firm, and my familiarity with lawsuits involving issues similar to the issues in this lawsuit, all attorneys' fees and costs incurred by Plaintiffs in this matter have been reasonable and necessary.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing statements are true and correct."

Executed this 3rd day of August, 2021



DAVID L. OVARD

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DECLARATION OF DAVID OVARD

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